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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Heather Farrell,

Plaintiff,

v.

Experian Information Solutions, Inc., and  
Goldman Sachs Bank USA,

Defendants.

Case No. 2:21-cv-01761-JCM-DJA

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME FOR  
GOLDMAN SACHS BANK USA TO  
RESPOND TO PLAINTIFF'S AMENDED  
COMPLAINT  
(First Request)**

Defendant Goldman Sachs Bank USA ("GS") and Plaintiff Heather Farrell stipulate as follows:

1. The operative deadline for GS to respond to Farrell's Amended Complaint is February 15, 2022. ECF Nos. 17, 18.

2. GS has requested, and Farrell has agreed to, an extension of this deadline up to and including March 17, 2022, to provide additional time for the parties to discuss resolution of Farrell's claims against GS.

3. The parties agree that there is good cause for this extension.

*[Continued on following page.]*

4. This is the first request for an extension, and it is made in good faith and not for purposes of delay.

Dated: February 14, 2022.

BALLARD SPAHR LLP

FREEDOM LAW FIRM

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**Order**

On the basis of good cause, IT IS ORDERED that the deadline for Defendant Goldman Sachs Bank USA to respond to Plaintiff Heather Farrell's Amended Complaint is extended up to and including March 17, 2022.

  
 United States Magistrate Judge

Dated: February 15, 2022